

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PARLER, INC.,

Plaintiff,

v.

AMAZON WEB SERVICES, INC.,

Defendant.

Case No 2:21-cv-00031-BJR

DECLARATION OF AMBIKA K.
DORAN IN SUPPORT OF
AMAZON WEB SERVICES,
INC.'S OPPOSITION TO
PARLER'S MOTION FOR
TEMPORARY RESTRAINING
ORDER

1 I, Ambika Kumar Doran, declare:

2 1. I am a partner in the law firm Davis Wright Tremaine LLP, counsel for Defendant
3 Amazon Web Services, Inc. I make this declaration from personal knowledge, publicly available
4 databases and information, and records my firm keeps in the regular course of business, and I
5 could testify competently to the same. I make this declaration in support of Amazon Web
6 Services, Inc.'s Opposition to Parler's Motion for a Temporary Restraining Order.

7 2. Attached as **Exhibit A** is a true and correct copy of Parler's homepage from
8 October 10, 2020, retrieved from The Internet Archive on January 11, 2021.

9 3. Attached as **Exhibit B** is a true and correct copy of Parler's December 4, 2020
10 Community Guidelines.

11 4. The May 19, 2019 FoxNews interview with Parler CEO, John Matze, is available
12 at <https://www.foxnews.com/media/parler-john-matze-no-censorship-election> (statement at 2:02)
13 and attached as **Exhibit C**.

14 5. Attached as **Exhibit D** is a true and correct copy of a CNBC article published
15 June 27, 2020 and updated June 28, 2020, *Trump fans are flocking to the social media app*
16 *Parler—its CEO is begging liberals to join them*, available at [https://www.cnbc.com/2020/](https://www.cnbc.com/2020/06/27/parler-ceo-wants-liberal-to-join-the-pro-trump-crowd-on-the-app.html)
17 [06/27/parler-ceo-wants-liberal-to-join-the-pro-trump-crowd-on-the-app.html](https://www.cnbc.com/2020/06/27/parler-ceo-wants-liberal-to-join-the-pro-trump-crowd-on-the-app.html).

18 6. The November 5, 2020 KUSI News interview with Mr. Matze is available at
19 <https://www.youtube.com/watch?app=desktop&v=F8IcjsFHwc8> (statements at 4:48, 5:42) and
20 attached as **Exhibit E**.

21 7. Attached as **Exhibit F** is a true and correct copy of a January 6, 2021 New York
22 Times article, *The storming of Capitol Hill was organized on social media*, available at
23 <https://www.nytimes.com/2021/01/06/us/politics/protesters-storm-capitol-hill-building.html>.

24 8. Attached as **Exhibit G** is a true and correct copy of a January 8, 2021 Vox article,
25 *How Trump's internet built and broadcast the Capitol insurrection*, available at
26 [https://www.vox.com/recode/22221285/trump-online-capitol-riot-far-right-parler-twitter-](https://www.vox.com/recode/22221285/trump-online-capitol-riot-far-right-parler-twitter-facebook)
27 [facebook](https://www.vox.com/recode/22221285/trump-online-capitol-riot-far-right-parler-twitter-facebook).

1 9. Attached as **Exhibit H** is a true and correct copy of a January 7, 2021 ProPublica
2 article, *Capitol Rioters Planned for Weeks in Plain Sight. The Police Weren't Ready*, available at
3 [https://www.propublica.org/article/capitol-rioters-planned-for-weeks-in-plain-sight-the-police-](https://www.propublica.org/article/capitol-rioters-planned-for-weeks-in-plain-sight-the-police-werent-ready)
4 [werent-ready](https://www.propublica.org/article/capitol-rioters-planned-for-weeks-in-plain-sight-the-police-werent-ready).

5 10. Attached as **Exhibit I** is a true and correct copy of a January 10, 2021 New York
6 Magazine Intelligencer article, *Feds Arrest Pro-Trump Insurrectionists Around the Country*,
7 available at [https://nymag.com/intelligencer/2021/01/capitol-riot-feds-round-up-pro-trump-](https://nymag.com/intelligencer/2021/01/capitol-riot-feds-round-up-pro-trump-insurrectionists.html)
8 [insurrectionists.html](https://nymag.com/intelligencer/2021/01/capitol-riot-feds-round-up-pro-trump-insurrectionists.html).

9 11. Attached as **Exhibit J** is a true and correct copy of Mr. Matze's January 9, 2021
10 statement regarding Parler's potential operational downtime.

11 12. Attached as **Exhibit K** is a true and correct copy of Mr. Matze's January 9, 2021
12 statement regarding Parler's preparation and other hosting options.

13 13. Attached as **Exhibit L** is a true and correct copy of a January 10, 2021 Guardian
14 article, *'Hang Mike Pence': Twitter stops phrase trending after Capitol riot*, available at
15 [https://www.theguardian.com/us-news/2021/jan/10/hang-mike-pence-twitter-stops-phrase-](https://www.theguardian.com/us-news/2021/jan/10/hang-mike-pence-twitter-stops-phrase-trending-capitol-breach)
16 [trending-capitol-breach](https://www.theguardian.com/us-news/2021/jan/10/hang-mike-pence-twitter-stops-phrase-trending-capitol-breach).

17 14. Attached as **Exhibit M** is a true and correct copy of a January 11, 2021 Gab post
18 by Joseph A. Camp publishing my personal information, available at [https://gab.com/](https://gab.com/JoeyCamp2020/posts/105540970660256881)
19 [JoeyCamp2020/posts/105540970660256881](https://gab.com/JoeyCamp2020/posts/105540970660256881).

20 15. Attached as **Exhibit N** is a true and correct copy of a January 9, 2021 New York
21 Times article, *Amazon, Apple and Google Cut Off Parler, an App That Drew Trump Supporters*,
22 available at <https://www.nytimes.com/2021/01/09/technology/apple-google-parler.html>.

23 16. Attached as **Exhibit O** is a true and correct copy of the transcript of the January 7,
24 2021 New York Times podcast Sway, hosted by Kara Swisher, *If You Were on Parler, You Saw*
25 *the Mob Coming*, available at [https://www.nytimes.com/2021/01/07/opinion/sway-kara-swisher-](https://www.nytimes.com/2021/01/07/opinion/sway-kara-swisher-john-matze.html?showTranscript=1)
26 [john-matze.html?showTranscript=1](https://www.nytimes.com/2021/01/07/opinion/sway-kara-swisher-john-matze.html?showTranscript=1).

1 I declare under perjury of penalty that the foregoing is true and correct.

2 Signed at Mercer Island, Washington, this 12th day of January, 2021.

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4 /s/ Ambika Kumar Doran
5 Ambika Kumar Doran
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CERTIFICATE OF SERVICE

I hereby certify that on January 12, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to those attorneys of record registered with the CM/ECF system. All other parties (if any) shall be served in accordance with the Federal Rules of Civil Procedure

DATED at Mercer Island, Washington this 12th day of January, 2021.

By s/ Ambika Kumar Doran
Ambika Kumar Doran, WSBA # 38237